

EXHIBIT 16

Excerpts from Deposition of Leah Sampson, MSW, LCSW

(Redacted)

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Civil Action: 9:19-cv-01322-KJD-NJK

PETER DELVECCHIA,)	
et. al.)	
	Plaintiffs,)	DEPOSITION OF:
)	
v.)	LEAH E. SAMPSON
)	
FRONTIER AIRLINES, INC.,)	
et. al.)	
)	
	Defendants,)	

Given before John P. Crawford, Jr., Court
Reporter and Notary Public for South Carolina, via
videoconference, on Thursday, November 10th, 2022,
commencing at 10:37 o'clock a.m.

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1 (DOCUMENTS PRE-MARKED AS DEFENDANT'S
2 EXHIBIT NOS. 1 AND FOR IDENTIFICATION.)

3 (Leah E. Sampson, being duly sworn,
4 testified as follows:)

5 DIRECT EXAMINATION BY MR. MAYE:

6 Q. Ms. Sampson, can you please state your full name?

7 A. Sure. It's Leah Elaine Sampson.

8 Q. What is your professional?

9 A. I am, I'm newly the chief executive officer at
10 Three Oaks Behavioral Health & Wellness, and I am
11 outpatient psychotherapist.

12 Q. Congratulations on that new position.

13 A. Thanks.

14 Q. Sure. And can you give us a brief thumbnail
15 sketch of your education?

16 A. I did my undergrad and I got, my undergrad is in
17 public relations, mass communications. I then
18 went on to Savannah State and got a master's of
19 social work, and that was in 2009. And then,
20 subsequently was license as a licensed clinical
21 social worker after, like, three years of
22 supervision and all of that.

23 Q. You're licensed by the state of North Carolina?

24 A. Yes, sir.

25 Q. And you provide a treatment to A [REDACTED] D [REDACTED],

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1 A. Yes.

2 Q. Was there ever any indication that he got these
3 stereotypes at home, from his family?

4 A. No, his dad was actually the one who brought up
5 to me that he was concerned that he didn't have
6 good relationships with black people.

7 Q. Okay. And since you met with both AD and his
8 father, did you ever, ever get any indication
9 whatsoever that Peter DelVecchia had abused the
10 A [REDACTED] in any way, shape, or form?

11 A. No, I did not.

12 Q. Okay. Thank you. That's all I have.

13 RE-DIRECT EXAMINATION BY MR. MAYE:

14 Q. I just have a few follow-up questions. With
15 respect to the PTSD diagnosis, if you removed all
16 of the other traumas, [REDACTED],
17 [REDACTED], [REDACTED], [REDACTED],
18 [REDACTED], could you diagnose AD with PTSD purely
19 based on the aircraft incident?

20 A. Yes.

21 Q. And why do you say that?

22 A. Because it's traumatic to be removed in that way
23 from the way that was described to me from your
24 caregiver, on a flight with people, like, you
25 don't have any other support. And him alone being

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